

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED
JUN -9 P 12:44
RICHARD W. WICKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

V.



CR 11 0373

JASON MOORE,

SI

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 286 - Conspiracy to File False Claim

A true bill.

[Signature]

Foreman

Filed in open court this 9th day of

June, 2011

Cora Klein

Clerk

[Signature] Bail \$ no bail warrant warrant

1 R

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 18 U.S.C. § 286 - Conspiracy to File
 False Claim

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY:

 18 U.S.C. § 286 - 10 yrs prison, \$250,000 fine, 3 yrs
 supervised release, \$100 assessment
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

INTERNAL REVENUE SERVICE

☐ person is awaiting trial in another Federal or State
 Court, give name of court

☐ this person/proceeding is transferred from another
 district per (circle one) FRCrP 20, 21 or 40. Show
 District

☐ this is a re prosecution of
 charges previously dismissed
 which were dismissed on
 motion of:

☐ U.S. Att'y ☐ Defense

☒ this prosecution relates to a
 pending case involving this same
 defendant

☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding
 this defendant were recorded under

 SHOW
 DOCKET NO.
 10-687-CRB
 10-686-CRB

 MAGISTRATE
 CASE NO.

 Name and Office of Person
 Furnishing Information on MELINDA HAAG
 THIS FORM

☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y
 (if assigned) THOMAS NEWMAN, AUSA, TAX DIV.

 Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

DEFENDANT

JASON MOORE

DISTRICT COURT NUMBER

CR 11 0373 SI

DEFENDANT**IS NOT IN CUSTODY**

- 1) ☒ Has not been arrested, pending outcome this proceeding.
 If not detained give date any prior summons
 was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

 Has detainer
 been filed?

☐ Yes
☒ No

 If "Yes"
 give date
 filed

 DATE OF
 ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

Month/Day/Year

 DATE TRANSFERRED
 TO U.S. CUSTODY

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS*

☒ WARRANT Bail Amount:

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 *Where defendant previously apprehended on complaint, no new summons
 or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

MELINDA HAAG (CABN 132612)
United States Attorney

FILED
2011 JUN -9 P 12:44
RICHARD W. WIEKIE
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON MOORE,

Defendant.

CR 11 0373

VIOLATION:
18 U.S.C. § 286 –
Conspiracy to File False Claim

SAN FRANCISCO VENUE

SI

INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. § 286 - Conspiracy to File False Claim)

Beginning in on or about June 2010, and continuing until on or about August 2010, in the
Northern District of California and elsewhere,

JASON MOORE,

and others, both known and unknown to the grand jury, unlawfully, willfully, and knowingly
agreed, combined, and conspired with others and each other to defraud the Internal Revenue
Service, an agency of the United States, by obtaining or aiding to obtain the payment or
allowance of false, fictitious, and fraudulent claims.

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MANNER AND MEANS

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2 1. JASON MOORE, and others, both known and unknown to the Grand Jury, agreed
3 to participate in, and participated in, a scheme to obtain or help others to obtain payment of false
4 claims for refunds from the Internal Revenue Service ("IRS") by filing in their own names, or
5 filing in the names of others, and by causing others to file, false 2009 federal income tax returns
6 claiming refunds to which they knew they were not entitled.

7 2. It was part of the conspiracy that individuals acting with JASON MOORE
8 procured the names and identities of others, through illegal means or by agreement with
9 participants in the scheme to file false federal tax returns using that identifying information.

10 3. As part of the scheme, JASON MOORE assisted in filing false federal income tax
11 by permitting others involved in the scheme to file the false returns from his residence.

12 4. In order to obtain the fraudulent payment, JASON MOORE agreed, combined,
13 and conspired to use pre-paid debit cards or obtain false identification.

14 5. In one instance, JASON MOORE obtained a false California driver's license in
15 the name of a person with the initials J.J. but with JASON MOORE's picture. JASON MOORE
16 obtained the false identification after a false return was filed with the Internal Revenue Service
17 and the fraudulent refund was issued in J.J.'s name. JASON MOORE agreed to cash the
18 fraudulent payment and split the proceeds with his accomplices.

19 In violation of Title 18, United States Code, Section 286.
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A True Bill

Dated: June 9, 2011

[Signature]
FOREPERSON

MELINDA HAAG
United States Attorney

[Signature]
MIRANDA KANE
Chief, Criminal Division

Approved as to Form

[Signature]
THOMAS M. NEWMAN
Assistant United States Attorney
Tax Division

INDICTMENT
CR-11-